UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SEFKET REDZEPAGIC, on behalf of himself and others similarly situated,

Plaintiff,

- against -

ROBERT HAMMER, MELOHN PROPERTIES INC., THE MELOHN GROUP LLC, L 4750, LLC, A 4750, LLC, 4750 BEDFORD L.L.C., LEON MELOHN, ALFONS MELOHN, and JOHN DOES #1-10, jointly and severally,

Defendants.

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14-cv-9808 (ER)

AFFIDAVIT OF
MARK N. REINHARZ

STATE OF NEW YORK)
) ss.:
COUNTY OF NASSAU)

MARK N. REINHARZ, being duly sworn deposes and says:

1. I am a member of Bond, Schoeneck & King, and PLLC and submit this affidavit in support of Defendants' motion for summary judgment.

2. Two depositions were taken by the Defendants in this matter. This included the January 8, 2016 deposition of the Plaintiff, Sefket Redzepagic and the January 14, 2016 deposition of Mary Clanton. Vice President of Local 2 of Building Service Employees & Factory Workers, the Union representing employees at 4750 Bedford Avenue, Brooklyn, New York. Ms. Clanton's deposition was taken pursuant to a subpoena issued by the Defendants.

3. Plaintiff did not take any depositions of any Defendants in this case.

4. Annexed hereto are true copies of the following documents which are submitted in support of the Defendants' motion for summary judgment: (1) the Affidavit of Andrew Melohn; (2) the Affidavit of Joseph Gottlieb; (3) the complete transcript of the deposition taken of

Plaintiff Sefket Redzepagic; (4) excerpts from the transcript of the deposition taken of Mary Clanton; and (5) the exhibits that are referenced in the above-two deposition transcripts and/or accompanying affidavits of Andrew Melohn and Joseph Gottlieb. Unless otherwise noted, the exhibit numbers set forth below correspond to the numbers that were assigned to the exhibits during Plaintiff's deposition:

Exhibit	*Document*
1.	Text messages between Plaintiff and Andrew Melohn during the period January 2012 – June 2014.
2.	Employee Earning Records (Redzepagic)
3.	Payroll Register (All employees at 4750 Bedford Avenue)
4.	Timesheets submitted by the Plaintiff Sefket Redzepagic during the period January 2012 -June 2014
5.	Employee Earning Reports for the Plaintiff Sefket Redzepagic covering the period September 30, 2011- July 4, 2014
6.	2011 Calendar
7.	2012 Calendar
8.	May 6, 2014 Turner e-mail to Redzepagic re vacation
9.	May 6, 2014 fax re demand for vacation
10.	September 13, 2010 Memo from Hammer
11.	September 16, 2010 Memo from Redzpagic re Harassment
12.	May 22, 2003 Memo from Hammer
13.	September 8, 2009 Memo from Hammer
14.	December 1, 2012 memo re complaints about Castro
15.	February 8, 2006 Investigation Report

16. June 21, 2004 Handwritten report re write up of employees

17. Note from Tenant "Alex"

18. 2013 calendar

19. Hammer note re payment of overtime (1/8/07)

20. Plaintiff Automatic Disclosures

21. Hammer note re overtime 4/21/03

22. Widroff e-mails

23. Severance Agreement and Release Version 1

24. Severance Agreement and Release Version 3

25. Severance Agreement and Release Version 5

26. Collective Bargaining Agreement between Melohn Properties and Local 2

27. July 3, 2014 Unfair Labor Practice charge file by Local 2

28. Appeal of Dismissal of Unfair Labor Practice Change by Local 2

29. December 8, 2014 NLRB Decision on Appeal

30. Englander-Clanton e-mails

31. Picture

32. Picture

33. Amended Answer and Counterclaim

34. Plaintiffs Response to Interrogatories Including damage calculations

35. Plaintiffs Response to Interrogatories (Amended)

36. July 3, 2014 Offer from ABRO to Redzepagic (Exhibit 1 in Clanton Deposition Transcript)

Sworn to before me this
12th day of May, 2016

Notary Public

KARIN BAILEY
Notary Public, State of New York
No. 31-4916675
Qualified in Nassau County
Commission Expires December 28, 2017

Mark N. Reinharz

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